

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
RICHARD DIAMOND DANIELS)	Case No. 18-30313-KRH
GAYLE ELAINE DANIELS)	Chapter 13
)	
Debtors)	

MOTION TO INCUR DEBT

COME NOW, the Debtors, by counsel, and as and for their Motion to Incur Debt, state as follows:

1. The Debtors filed this case under Chapter 13 of the U.S. Bankruptcy Code on January 22, 2018.
2. The Debtors have applied for and Primary Residential Mortgage, Inc. has approved a loan to the Debtors in the amount of \$219,300.00 plus interest at 5.125% per annum to be repaid with estimated equal monthly payments of approximately \$1,606.00 for principal and interest for the purchase of a home located at 4439 Eagle Court, Waldorf Maryland 20603. The loan term is three hundred sixty (360) months with an estimated monthly payment of \$1,606.00. The closing costs are to be paid by the Debtors.
3. The purchase of the Property is in the best interest of the Debtors and will facilitate their ability to perform under their Chapter 13 Plan filed herein.
4. The Debtors' Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

WHEREFORE, the Debtors request that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

RICHARD DIAMOND DANIELS
GAYLE ELAINE DANIELS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
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NOTICE OF MOTION AND HEARING

The above Debtors have filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **March 11, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: March 6, 2020

RICHARD DIAMOND DANIELS
GAYLE ELAINE DANIELS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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/s/ James E. Kane
James E. Kane

Label Matrix for local noticing

0422-3

Case 18-30313-KRH

Eastern District of Virginia

Richmond

Fri Mar 6 16:50:25 EST 2020

UST smg Richmond

Office of the U. S. Trustee

701 East Broad St., Suite 4304

Richmond, VA 23219-1849

BLI Rentals

715 Merchants Street

Emporia, KS 66801-2809

Bridgecrest Credit Company, LLC

PO BOX 29018

PHOENIX, AZ 85038-9018

Cardworks/CW Nexus

Attn: Bankruptcy

Po Box 9201

Old Bethpage, NY 11804-9001

Chesterfield Oral Surgery, Inc

10110 Iron Bridge Rd

Chesterfield, VA 23832-6529

Fingerhut

Bankruptcy Dept

6250 Ridgewood Rd

Saint Cloud, MN 56303-0820

(p)JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

Nissan Motor Acceptanc

Po Box 660360

Dallas, TX 75266-0360

OneMain Financial

Attn: Bankruptcy Department

601 Nw 2nd St #300

Evansville, IN 47708-1013

BLI Rentals, LLC

c/o Spotts Fain PC

411 E. Franklin St.

Suite 600

Richmond, VA 23219-2200

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

BLI Rentals, LLC

PO Box 992

Emporia, KS 66801-0992

Capio Partners Llc

Attn: Bankruptcy

Po Box 3498

Sherman, TX 75091-3498

Cash Net USA

175 W. Jackson Blvd.

Suite 1000

Chicago, IL 60604-2863

Commonwealth of Virginia

Department of Taxation

PO Box 2156

Richmond, VA 23218-2156

(p)FOCUSED RECOVERY SOLUTIONS

9701 METROPOLITAN COURT

STE B

RICHMOND VA 23236-3690

MERRICK BANK

Resurgent Capital Services

PO Box 10368

Greenville, SC 29603-0368

Nissan Motor Acceptance

POB 660366

Dallas, TX 75266-0366

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

PRA Receivables Management LLC

POB 41067

Norfolk, VA 23541-1067

Ashley Funding Services, LLC its successors

assigns as assignee of Laboratory

Corporation of America Holdings

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Bon Secours

PO Box 1123

Minneapolis, MN 55440-1123

Capital One Bank

c/o Glasser and Glasser

PO Box 3400

Norfolk, VA 23514-3400

Chesterfield Oral Surgery Center, Inc.

c/o Sharon N. Horner & Associates PLC

6804 Patterson Avenue Suite A

Richmond, VA 23226-3429

Dish

P O Box 94063

Crewe, VA 23930-0000

Henrico Fcu

9401 W Broad St

Henrico, VA 23294-5331

NPRT0 South-East, LLC

256 W. Data Drive

Draper, Utah 84020-2315

ONEMAIN

PO BOX 3251

EVANSVILLE IN 47731-3251

Progressive Financing

256 W Data Drive

Draper, UT 84020-2315

Quantum3 Group LLC as agent for
 CF Medical LLC
 PO Box 788
 Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
 Sadino Funding LLC
 PO Box 788
 Kirkland, WA 98083-0788

Receivable Management Inc
 7206 Hull Rd
 Ste 211
 Richmond, VA 23235-0000

Sharon N. Horner & Associates
 6804 Patterson Ave.
 Suite A
 Richmond, VA 23226-3429

Sunrise Credit Service
 260 Airport Plaza Blvd.
 Farmingdale, NY 11735-4021

United Consumers
 14205 Telegraph Rd
 Woodbridge, VA 22192-4615

Virginia Department of Tax
 P.O. Box 2369
 Richmond, VA 23218-2369

Wells Fargo Bank
 Po Box 94435
 Albuquerque, NM 87199-4435

Wells Fargo Bank, N.A.
 435 Ford Road, Suite 300
 Saint Louis Park, MN 55426-4938

Carl M. Bates
 P. O. Box 1819
 Richmond, VA 23218-1819

Gayle Elaine Daniels
 1408 N. 32nd St
 Richmond, VA 23223-6716

James E. Kane
 Kane & Papa, PC
 1313 East Cary Street
 P.O. Box 508
 Richmond, VA 23218-0508

John P. Fitzgerald, III
 Office of the US Trustee - Region 4 -R
 701 E. Broad Street, Ste. 4304
 Richmond, VA 23219-1849

Richard Diamond Daniels
 1408 N. 32nd St
 Richmond, VA 23223-6716

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Focused Recovery Solutions
 9701-Metropolitan Ct
 Ste B
 Richmond, VA 23236-0000

Jefferson Capital Systems, LLC
 16 Mclelland Rd
 Saint Cloud, MN 56303-0000

Portfolio Recovery Associates, LLC
 PO Box 41067
 Norfolk, VA 23541

End of Label Matrix
 Mailable recipients 43
 Bypassed recipients 0
 Total 43